



Telecommunications  
Law Professionals PLLC

1025 Connecticut Avenue, NW  
Suite 1011  
Washington, DC 20036  
telephone 202.789.3120  
facsimile 202.789.3112  
www.telecomlawpros.com

HDisenhaus@telecomlawpros.com  
202.789.3123

September 13, 2018

**VIA ECFS**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th St. SW  
Washington, DC 20554

**Re: *Ex parte* Presentation in WC Docket Nos. 13-39, 18-155, 18-156,**

Dear Ms. Dortch:

On September 12, 2018, Robert W. McCausland, VP, Regulatory and Government Affairs, West Telecom Services, LLC ("West Telecom"), and I met with Dr. Jay Schwarz, Wireline Advisor to Chairman Pai.

Following an update on West Telecom and some of its affiliates, we discussed the feasibility of forming a new Commission working group, perhaps as part of the Communications Security, Reliability and Interoperability Council, that would work pro-actively to anticipate and prevent potential fraudulent activity as new telecommunications technologies and services are developed and implemented. West Telecom is committed to deploy STIR/SHAKEN within its network as quickly as the vendor software can be finalized, fully tested, and made commercially available for wide-scale deployment (likely in the first half of 2019).

We also briefly discussed West Telecom's positions in the above-referenced dockets, consistent with and as reflected in West Telecom's filings in those proceedings. West Telecom particularly emphasized the benefits of targeted remedial measures, industry cooperation, and economically-justified direct connections in addressing call completion and fraudulent calling problems.

Sincerely,

Helen E. Disenhaus  
of TELECOMMUNICATIONS LAW PROFESSIONALS PLLC

cc: Dr. Schwarz ([jay.schwarz@fcc.gov](mailto:jay.schwarz@fcc.gov))